METERING ICF PACKAGE CHANGES

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: PLUS ES

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1. Context

This template is to assist stakeholders in giving feedback about the changes detailed in the initial draft procedures associated with the Metering ICF Package Changes consultation.

The changes being proposed are because of NER rule changes which have occurred requiring changes to AEMO's Retail Electricity Market Procedures and the following proposed changes by proponents and AEMO to implement recommended process improvements.

2. MSATS Procedures: CATS

Section	Description	Participant Comments
2.1.(l)	New section added to clarify the communication of the identification of incorrect NMI	
2.4.(c)	Updated to define timeframes for updating datastreams in MSATS	PLUS ES agrees with the intent of the clause; however, suggests a clarification so it cannot be interpreted as a requirement to de-activate Datastreams when a NMI is Inactive. An MDP should have the option to maintain active Datastreams irrespective of the energisation status of the NMI. PLUS ES also suggests that the MSATS update should be from the time the MDP is notified not of the connection point being re-energised.

Section	Description	Participant Comments
2.4.(d)	Updated to define timeframes for updating datastreams in MSATS	PLUS ES agrees with the intent of the clause; however, suggests a clarification so it cannot be interpreted as a requirement to de-activate Datastreams when a NMI is Inactive. An MDP should have the option to maintain active Datastreams irrespective of the energisation status of the NMI. PLUS ES also suggests that the MSATS update should be from the time the MDP is notified not of the connection point being re-energised.
2.4.(e)	Updated to define timeframes for updating datastreams in MSATS	PLUS ES agrees with the intent of the clause; however, suggests a clarification so it cannot be interpreted as a requirement to de-activate Datastreams when a NMI is Inactive. An MDP should have the option to maintain active Datastreams irrespective of the energisation status of the NMI. PLUS ES also suggests that the MSATS update should be from the time the MDP is notified not of the connection point being re-energised.
2.4.(f)	Updated to define timeframes for updating datastreams in MSATS	
2.4.(h)	Updated to define timeframes for updating datastreams in MSATS	

Section	Description	Participant Comments
2.5.(a)	New section added to define the dates MPs must use when updating MSATS about remote de-energisations	
2.5.(b)	New section added to define the dates MPs must use when updating MSATS about remote re- energisations	PLUS ES notes: The Interval Meter Register Status Code should be 'C' (Current), not 'A'
4.18	Updated to clarify the LNSP's obligations in relation to creating Embedded Network Codes and ENM's obligations in relation to application of the Embedded Network Code and data provided to AEMO upon appointment.	

3. MSATS Procedures: WIGS

Section	Description	Participant Comments
Version	Updated to align version numbering with MSATS: CATS procedures	

4. Metrology Procedure: Part A

Section	Description	Participant Comments
	General	
3.1.(a)	Update to remove the word 'relevant'	
3.1.(b)	Update to remove the word 'relevant'; add requirements of AS60044.3 or IEC61869.1 and IEC61869.2; and detail what each topic the part of the standard covers	
3.1.(c)	Update to remove the word 'relevant'; add requirements of IEC61869.1 and IEC61869.3; and detail what each topic the part of the standard covers	
3.1.(d)	Update to include International Standards covered in 3.1.(b) and 3.1.(c).	
12.5.(a)	Removal of obsolete standard AS2490	
12.5.(b)	New section added to detail Sample Test Plan settings	
12.5.(c)	New section added to specify when a test sample is deemed to have passes the verification test	

Section	Description	Participant Comments
12.5.(d)	New section added to specify when the steps to be followed after each round of verification	
12.5.(e)	Update to specify that verification tests must be conducted at least one every 12 months	

5. Metrology Procedure: Part B

Section	Description	Participant Comments
2.6	Update to include additional substitution type 69	
5.3.9	Addition of substitution type 69: Linear Interpolation	

6. Service Level Procedure Meter Data Provider Services

Section	Description	Participant Comments
2.4.1.(ix)	New section added to define an obligation to activate datastreams when energy is recorded from a metering installation while the NMI status is not Active	PLUS ES agrees with the intent of the clause; however, suggests a clarification so it cannot be interpreted as a requirement to de-activate Datastreams when a NMI is Inactive. An MDP should have the option to maintain active Datastreams irrespective of the energisation status of the NMI.
2.4.1.(x)	New section added to define an obligation to deliver validated metering data to market participants when datastreams are active	
4.2.(g)	Amend outdated rule reference	
6.4.1.(c)	Amend outdated rule reference	
7.3.(b)	Amend outdated rule reference	

7. Service Level Procedure Meter Provider Services

Section	Description	Participant Comments
4.2.(a)(iii)	Amend outdated rule reference	
5.2.(a)	Updated to incorporate additional clause reference for timeframes for metering installation malfunction identification and rectification.	

8. Service Level Procedure Embedded Network Manager

Section	Description	Participant Comments
2.1.2.(d)	New section added to define an obligation that the EN for which the ENM has been appointed has an exemption by the AER.	
4.2.1.	Updated to clarify ENM's obligations with respect to DLFs.	
4.2.2.	Updated to clarify ENM's obligations with respect to DLFs.	PLUS ES suggests rewording 4.2.2 (a) as it is confusing as currently worded.

Section	Description	Participant Comments
4.3.3.(a)	Updated to clarify ENM's obligations with respect to Network Tariff Codes.	

9. Exemption Procedure Meter Installation Malfunctions

Section	Description	Participant Comments
1.1.	Updated to incorporate additional clause reference for timeframes for metering installation malfunction identification and rectification.	
2.2.	Updated to incorporate additional clause reference for timeframes for metering installation malfunction identification and rectification.	
Appendix A	Updated to incorporate additional clause reference for timeframes for metering installation malfunction identification and rectification.	
Appendix B	Updated to incorporate additional clause reference for timeframes for metering installation malfunction identification and rectification.	

10.　　Other Issues Related to Consultation Subject Matter

Heading	Participant Comments
Are there better options to accommodate the change proposals, that better achieve the required objectives? What are the pros and cons of these options? How would they be implemented?	PLUS ES would like to provide comment as per the following: Clause 12.5 Metrology Procedure – what objectives are being achieved with validating data on manually read metering installations? For Type 4A and Type 5 metering installation, data collection is via probe reading therefore there isn't any opportunity for transcription error, as the data that is collected automatically and automatically associated with the meter device ID, as part of the communications with the meter. One could argue if data collection is of this nature, then it is not required to be validated
What are the main challenges in adopting these proposed changes? How should these challenges be addressed?	